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10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 JEFFREY HANKINS,

13 Plaintiff

14 vs.

15 UNITED AIRLINES, INC., and DOES I through X,
16 inclusive,

17 Defendants.

Case No: 2:21-cv-00274-APG-DJA

**STIPULATION TO EXTEND EXPERT
DISCLOSURES DEADLINES**

(SECOND REQUEST)

18 Plaintiff Jeffrey Hankins ("Plaintiff") and Defendant United Airlines, Inc., ("United") by and
19 through their respective attorneys of record, respectfully submit this stipulation to extend all current
20 discovery and other remaining deadlines to allow the parties to complete the fact discovery that is
21 necessary for the reasons stated below.

22 (a) Discovery Completed

23 The parties state that the following discovery has been completed: the parties have exchanged
24 initial disclosures and have served and responded to written discovery. Additionally, United has
25 conducted its internal investigation of the incident.

26 (b) Discovery that Remains to be Completed and Good Cause to Allow the Parties to Complete Fact
27 Discovery

28 United has propounded discovery requests to Plaintiff. It is United's position that the responses
29 to the discovery requests are inadequate. For example, Plaintiff has alleged severe injuries in this
30 matter and United has not received documents supporting those damages, or information or
documents pertaining to the existence of pre-existing injuries and medical procedures undergone.
United has met and conferred accordingly as it must obtain the information and documents necessary
to proceed with this matter, including with taking depositions and completing expert disclosures.

Plaintiff has requested additional time to respond to United's meet and confer efforts due to the hardship on the part of Plaintiff's counsel. The attorney who was handling the matter at Plaintiff's counsel's law firm has resigned, and Plaintiff's counsel therefore needs additional time to address the remaining discovery matters. Plaintiff has also requested time to provide medical documents pertaining to Plaintiff's injuries, pre-existing or otherwise, as Plaintiff doesn't anticipate that he can acquire the documents within existing deadlines. United has confirmed extension requests and has held off on filing motions to compel the responses for this reason. The parties would like to avoid motion work and having to seek court intervention on these matters. For this reason, the parties ask that this Court to grant additional time to complete discovery and the additional remaining deadlines.

The current deadlines are:

- | | |
|---|----------|
| 1. Deadline to complete fact discovery and expert disclosures | 8/18/21 |
| 2. Deadline to complete rebuttal expert disclosures | 9/8/21 |
| 3. Deadline to file Dispositive Motions | 9/17/21 |
| 4. Deadline to file a Consolidated Pre-Trial Order | 10/18/21 |

The parties respectfully request that this Court extend these deadlines by a period of ninety (90) days, to the dates:

- | | |
|---|----------|
| 1. Deadline to complete fact discovery and expert disclosures | 11/16/21 |
| 2. Deadline to complete rebuttal expert disclosures | 12/7/21 |
| 3. Deadline to file Dispositive Motions | 12/16/21 |
| 4. Deadline to file a Consolidated Pre-Trial Order | 1/17/22 |

So stipulated, subject to Court's approval.

Dated this 29th day of June, 2021.

Tingey Injury Law Firm

/s/ Scott B. Van Alfen

Scott B. Van Alfen, Esq.
817 S. Main Street
Las Vegas, NV 89101
Attorney for Plaintiff
JEFFREY HANKINS

//

1 Dated this 29th day of June, 2021.

2 VICTOR RANE


3 */s/ Dana Zokaeim*

4 _____
5 Michael Cutler, Esq.
6 Dana Zokaeim, Esq.
7 9350 Wilshire Blvd., Suite 308
8 Beverly Hills, CA 90212
9 Attorney for Defendant
10 UNITED AIRLINES, INC.

11 **IT IS SO ORDERED.**

12 **ORDER**

13 Dated this 1st day of July, 2021.

14 
15 _____
16 UNITED STATES MAGISTRATE JUDGE



Kimberly Couillard <kimberly@tingeylawfirm.com>

Jeffrey Hankins v. United Airlines, Inc: Stipulation and Order to Extend Deadlines

Dana Zokaeim <dzokaeim@victorrane.com>

Tue, Jun 29, 2021 at 1:35 PM

To: Kimberly Couillard <kimberly@tingeylawfirm.com>, Scott Van Alfen <scott@tingeylawfirm.com>

Cc: Cree Jacobs <cree@tingeylawfirm.com>, Alejandra Jimenez <alejandra@tingeylawfirm.com>, Michael Cutler <mcutler@victorrane.com>, Doug Griffith <dgriffith@victorrane.com>

Scott,

Please see attached revised version of the stipulation. We needed a more solid basis to ask for an extension the second time around. Please review and let us know if acceptable. If so, you can affix my signature and file. Thanks again.

Dana

Dana Zokaeim | Attorney

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SAO to Extend Deadlines - DZ revised.docx

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